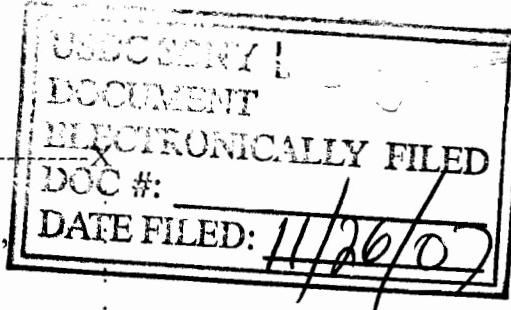


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TELENOR MOBILE COMMUNICATIONS AS,



Petitioner, :

-against- : 07 Civ. 6929 (GEL)

STORM LLC, : ECF Case

Respondent. :

X

**NOTICE OF MOTION FOR STAY**  
**PENDING APPEAL OR TEMPORARY STAY**

**PLEASE TAKE NOTICE**, that upon the accompanying declaration of Pieter Van Tol, the respective exhibits thereto, and the accompanying memorandum of law, Storm LLC ("Storm"), by its attorneys Lovells LLP, shall move this Court for an order, pursuant to Rule 62(c) of the Federal Rules of Civil Procedure, staying the enforcement of the Court's November 2, 2007 Opinion and Order (the "Order") and judgment entered the same day (the "Judgment") pending the conclusion of Storm's appeal or, in the alternative, temporarily staying the enforcement of the Order and Judgment to enable Storm to apply to the United States Court of Appeals for the Second Circuit for a stay pursuant to Rule 8(a) of the Federal Rules of Appellate Procedure.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Rule 6.1(b) of the Local Civil Rules, any papers in response shall be due within ten business days of the service of this Notice.

Dated: New York, New York  
November 15, 2007

LOVELLS LLP

By: Pieter Van Tol  
Pieter Van Tol (PVT-2455)  
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*Attorneys for Petitioner*

*Gerard E. Lynch*  
SO ORDERED  
GERARD E. LYNCH, U.S.D.J.  
*11/26/07*